## STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF ILLINOIS	1 6
Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott and	Docket No. 12-0598
Shelby, Illinois.	

## **VERIFIED PETITION FOR LEAVE TO INTERVENE**

JDL Broadcasting, Inc., by its attorneys, Hinshaw & Culbertson LLP, petition for leave to intervene in this proceeding. In support of its petition, petitioner states:

- 1. JDL Broadcasting, Inc. leases property in Clark County owned by Doug and Yvonne Dahnke that is described on Exhibit C to the Verified Petition filed by Ameren Transmission Company of Illinois ("Ameren") as lying within the primary route between Kansas to Indiana State identified by Ameren for its proposed 345 kV line. JDL Broadcasting, Inc. has a long term lease on the property that is essential to WMMC radio station's operation identified as being within the transmission's line's route, and JDL Broadcasting, Inc.'s interests will be directly and adversely affected if the proposed Ameren transmission line is located on its property.
- 2. JDL Broadcasting, Inc. agrees to accept the status of the record as it exists at the time of the filing of this Petition and to accept service by electronic means as provided in Section 200.1050 of the Commission's Rules of Practice (83 Ill. Adm. Code §200.1050). For the purpose

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of receiving service in this proceeding, JDL Broadcasting, Inc. requests that the following persons be placed on the official service list:

Edward R. Gower
Hinshaw & Culbertson LLP
400 S. Ninth St.
Suite 200
Springfield, IL 62701
(217) 528-7375
egower@hinshawlaw.com

Lori Spangler Vice President JDL Broadcasting, Inc. P.O. Box 158 Marshall, IL 62441 Wmmc106@gmail.com

WHEREFORE, Petitioner herewith prays it be granted leave to intervene, and become a party to the above styled proceeding as JDL Broadcasting, Inc., for the purpose of producing evidence and cross-examining witnesses and with the right to file appropriate briefs and pleadings and participate in oral argument before the Commission, should oral argument be granted.

## Respectfully submitted,

JDL BROADCASTING, INC.

/s/ Edward R. Gower

Edward R. Gower One of Its Attorneys

Edward R. Gower Hinshaw & Culbertson LLP 400 South Ninth Street Suite 200 Springfield, IL 62701 217-528-7375 egower@hinshawlaw.com

Dated: December 17, 2012

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STATE OF ILLINOIS	)	
	)	SS
COUNTY OF SANGAMO	N )	

## **VERIFICATION**

Edward R. Gower, being first duly sworn, deposes and says that he is one of the practicing attorneys in the firm of Hinshaw & Culbertson LLP and one of the attorneys for JDL Broadcasting, Inc., and he is duly authorized to execute this Petition for Leave to Intervene; that he has read the above foregoing document, has knowledge of the facts stated therein and states that the matters set forth therein are true in substance and in fact.

Edward R. Gower
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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this  $17^{\rm th}$  day of December, 2012.

OFFICIAL SEAL KATHLEEN BENNER NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES:07/28/13

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